

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Thomas Sierra,

Plaintiff,

v.

Reynaldo Guevara et al.,

Defendants.

No. 18 C 3029

Hon. John Z. Lee,
District Judge

Hon. M. David Weisman,
Magistrate Judge

**Parties' Joint Status Report Regarding
Related *Monell* Discovery and Fact Discovery Deadline**

Pursuant to the Court's order of November 12, 2021 (Dkt. 346), the parties respectfully submit the following status report.

1. The parties have conferred and reached agreement on the procedural steps necessary to permit the parties' use of the CPD homicide files, and associated State's Attorney and Public Defender files, from *Reyes/Solache, Fields and Rivera*. By agreement, Plaintiff will designate the specific set of files from those cases to be used here, and identify that such records will be treated as confidential pursuant to the protective order in this case. No action by this Court is necessary.

2. Additionally, the parties have conferred about the length of time needed to complete all individual case and *Monell* fact discovery. Based on the approximately 10-12 depositions left to completed, the upcoming holidays, and upcoming deadlines in other cases, the parties jointly request an extension through March 1, 2022 to complete all individual and *Monell* fact discovery.

December 13, 2021

Respectfully submitted,

/s/ Anand Swaminathan

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CERTIFICATE OF SERVICE

I, Sean Starr, an attorney, hereby certify that on December 13, 2021 I caused the foregoing Joint Status Report to be filed using the Court's CM/ECF system, thereby effectuating service on all counsel of record.

/s/ Sean Starr
Attorney for Plaintiff